

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

- vs -

**TÜRKİYE HALK BANKASI A.S.,
a/k/a “Halkbank,”**

Defendant.

Case No. 15 Cr. 867 (RMB)

**DECLARATION OF ANDREW C. HRUSKA
IN SUPPORT OF KING & SPALDING LLP’S
MOTION TO WITHDRAW AS COUNSEL**

I, Andrew C. Hruska, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner with the law firm of King & Spalding LLP (“K&S”), counsel of record for Halkbank in the above-captioned matter.
2. I make this Declaration in Support of K&S’ Motion to Withdraw as Counsel, pursuant to Local Rule 1.4 of the Rules of this Court.
3. I do not believe Halkbank will suffer any prejudice from K&S’ withdrawal as counsel in the above-captioned matter. Robert Cary of Williams & Connolly has filed a notice of appearance on March 27, 2020 that includes authorization from Halkbank to represent it in further proceedings in this matter and to proceed with the arraignment. The Court has scheduled arraignment for March 31, 2020, and Halkbank has new counsel prepared to represent it at the arraignment and going forward in this case.
4. I have informed Halkbank that K&S intends to move to withdraw. Halkbank has consented to the filing of this motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 27, 2020 in New York, New York.

/s/ Andrew C. Hruska
Andrew C. Hruska
William F. Johnson
Katherine Kirkpatrick
Jacob Gerber
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*Withdrawing Attorneys for
Defendant Halkbank*